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No. _____

IN THE

Supreme Court of the United States

OCTOBER TERM, 1988

JAMES N. FLEMING,

Petitioner,

—v.—

W. BEDFORD MOORE, III, et al.,

Respondents.

BRIEF OF THE CENTER FOR CONSTITUTIONAL RIGHTS, ET AL., *AMICI CURIAE* IN SUPPORT OF PETITION FOR CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

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MOTION FOR LEAVE TO FILE AND BRIEF OF CENTER FOR CONSTITUTIONAL RIGHTS, ET AL. AS AMICI CURIAE IN SUPPORT OF PETITION FOR CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

The Center for Constitutional Rights (CCR), on behalf of the undersigned organizations, respectfully moves for leave to file the attached brief Amici Curiae in support of Petitioner James N. Fleming. CCR was born of the civil rights movement and the struggles of Black people in the United States for true equality. CCR attorneys have been active in cases involving voting rights, jury composition, community control of schools, fair housing and employment discrimination. Through litigation and public education, CCR has worked to protect and make meaningful the constitutional and statutory rights of women, Blacks, Puerto Ricans, Native Americans and Chicanos.

PRELIMINARY STATEMENT

> I am a lover of liberty and freedom of opportunity. I cannot stand by and see the have-nots oppressed by the no-growth people who are living off of our work. I know that this Country did not achieve the highest living standard in the world by no-growth or by oppression of the working man, and yet today the opportunity to improve one's living standard is being violently opposed by the same people who oppose my proposed neighborhood.
>
> James N. Fleming

For those, and similar thoughts and opinions, James N. Fleming, who is black, and a local real estate developer in his hometown of Charlottesville, Virginia, has been ordered by the Virginia State Supreme Court to pay to a white man a libel judgment in excess of two-hundred thousand dollars. In 1974, Mr. Fleming sought to have land in Albermarle County, Virginia re-zoned to allow him to develop a low cost, racially integrated housing project. W. Bedford Moore, III, whose own home is a replica of Thomas Jefferson's Monticello mansion, became Fleming's chief critic and opponent in public hearings before the zoning board. In addition to opposing the re-zoning, Moore urged that if the project was allowed, Mr. Fleming should be required to put a 150 foot tree buffer between the development and Moore's adjoining

residential estate.

After a fourteen month effort to proceed with the project, Mr. Fleming took out an advertisement in the local newspapers. The advertisement, captioned "Racism," noted "a great deal of irony" that while "Mr. Jefferson even located his slaves' quarters down the hill from his house, . . . [W. Bedford Moore] does not want any black people within his sight."

The response by Mr. Moore was a million dollar libel suit. Therein, Moore alleged that he, "a member of the white race," had been "insulted, humiliated, and mortified," by Fleming, "a member of the black race." In the ensuing ten years of litigation, the Virginia Supreme Court refused to hear Mr. Fleming's free speech arguments under the federal or Virginia state constitutions. This Court denied

certiorari review to determine whether Fleming's advertisement was a constitutionally protected expression of opinion.[1] Thereafter, the state trial court awarded a half million dollar judgment which was reduced on remittitur to $233,000.

While Fleming's case was on appeal in the state court system, the Virginia Supreme Court rendered a decision in another defamation action involving a professional dispute between two white litigants. In dismissing the action, that court held:

> The First Amendment to the Federal Constitution and article 1, section 12 of the Constitution of Virginia protect the right of the people to teach, preach, write, or speak any [pure expression of] opinion [not amounting to 'fighting words'],

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[1] Fleming v. Moore, 479 U.S. 890, reh'g denied, 479 U.S. 1012 (1986).

> however ill-founded, without inhibition by actions for libel and slander.[2]

The discriminatory judgment against Fleming constitutes a resurrection of the Virginia General Assembly's enactment of 1847-48,[3] and as such brands Fleming with a badge and incident of slavery in contravention of the Thirteenth Amendment to the federal Constitution. At issue here is the legitimacy of Mr. Fleming's efforts to pursue this claim in the federal courts. Dismissing Fleming's claim under 42 U.S.C.

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[2] Chaves v. Johnson, 230 Va. 112, 335 S.E.2d 97 (1985).

[3] The Virginia slave code, codified in the 1860 Code of Virginia, made criminal the "use [of] provoking language or menacing gestures to a white person," by a "negro" punishable by no more than thirty-nine stripes on his or her back to be administered in the public square. See Petitioner's Appendix ("P.App.") at 98. In the instant case, Fleming has, in effect, suffered at the hands of the state judiciary a judgment of $6,000 per stripe.

§ 1983, the United States district court for the Western District of Virginia held that it was without subject matter jurisdiction to sit in appellate review of a state court judgment.[4] Ruling on Fleming's motion to enjoin or stay that decision pending appeal, Judge Widener of the Fourth Circuit conceded that the libel verdict and judgment of the Virginia Supreme Court was "of course" a "badge of slavery," see P.App. at 36, but denied the requested relief, in part, on the ground that Fleming was not likely to prevail on his claim that jurisdiction of the district

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[4]District Court order is appended hereto. See P.App. at 1, 6-7. Fleming's earlier action in federal court similarly resulted in dismissal, in part, on the ground that the court believed it lacked jurisdiction to "relitigate the libel issues under [the] circumstances." Fleming v. Moore, 780 F.2d 438, 440 (4th Cir. 1985), cert. denied, 475 U.S. 1123 (1986).

court was not barred by the Rooker-Feldman[5] doctrine. Id.

Amicus Curiae respectfully urge and implore this Court on behalf of Mr. Fleming and all Black Virginians to issue a writ of certiorari to determine whether the Rooker-Feldman doctrine applies to legitimate claims of discrimination arising under the Thirteenth and Fourteenth Amendments to the Constitution of the United States.

ARGUMENT

I.

Just this term, this Court issued a projected "landmark" opinion in Texas v Johnson, 57 U.S.L.W. 4770 (U.S. June 21, 1989), which recognized the right of

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[5]Briefly stated, the Rooker-Feldman doctrine bars district court jurisdiction to review state court judgments. See District of Columbia Court of Appeals v. Feldman, 460 U.S. 462 (1983); Rooker v. Fidelity Trust Co., 263 U.S. 4113 (1923).

protestors to burn the United States flag. While such acts of symbolic expression are now properly cloaked with the full protection of the Constitution, those expressions, such as Fleming's, which seek to give substance to the national commitment to racial equality, are not so protected in the State of Virginia.

Noting the "great conflict waging between the haves and the have-nots," in 1974, Fleming sought through responsible leadership to improve the condition of the poor and disadvantaged. Those lingering conditions and consequent frustrations of Blacks in contemporary American society are real and well-documented. Particularly in the area of economic equality, recent studies indicate that the quality of life for Blacks in America remains out of sync

with mainstream white America.[6] Moreover, prospects for the future are not encouraging. One economist has predicted that "it would . . . take another 131 years or until the year 2118 to obtain parity

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[6]For example, in 1986, 31.1% of Blacks and 27.3% of Latinos had incomes below the poverty level -- nearly three times the rate for whites. One-Third of a Nation: A Report of the Commission On Minority Participation In Education and American Life 3 (May 1988)[hereinafter "One-Third of a Nation"]. In 1989, a National Urban League study indicates that Blacks did not fair much better. The State of Black America 1989 notes that "it is ironic that in 1989, the 200th anniversary of the adoption of the U.S. Constitution that defined blacks as 'three-fifths' of other persons, black income is well below 60 percent of white income, and other indicators find blacks at an even greater disadvantage." The State of Black America 4 (January 1989). Notwithstanding the gross disparities in income, a study commissioned by the NAACP Legal Defense and Educational Fund indicates that "the vast majority of the persistently poor [and mainly minority population] have mainstream aspirations for themselves and their children." See The Unfinished Agenda on Race In America, Executive Summary (January 1989)[hereinafter "The Unfinished Agenda").

[between Blacks and whites] in per capita income."[7]

Twenty years ago, the Kerner Commission, in the wake of widespread riots in urban ghettos, raised the stark prospect of a nation "moving toward two societies, one black, one white -- separate and unequal." The Kerner Report Updated further declared, "We must bring the problems of race, unemployment, and poverty back into the public consciousness, put them back on the public agenda."[8] Where

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[7]The State of Black America, supra at 11.

[8]The Kerner Report Updated, Report of the 1988 Commission on the Cities, Race and Poverty in the United States Today, National Conference: "The Kerner Report Twenty Years Later" (Racine, WI: Johnson Foundation Wingspread Conference Center, February 27-29, 1988), 16, quoted in One-Third of a Nation at 18. See also generally W. Julius Wilson, The Truly Disadvantaged: The Inner City, the Underclass, and Public Policy (University of Chicago Press 1987).

those problems exist within a state judiciary there is no justification to forsake curative action.

During the Civil Rights Movement of the 1960's millions of Black people risked life, limb, and liberty in pursuit of legal recognition of their rights. Pursuing claims under the Thirteenth and Fourteenth Amendments, civil rights lawyers, activists, and common folk consistently challenged the authority of state courts to undermine rights guaranteed by the federal Constitution. Today the majority of the Court that once courageously extended to Black citizens protections comparable to those of their white counterparts has consistently frustrated, through mechanistic legal rulings, concrete efforts to devise, promote and enforce policies designed to achieve for <u>all</u> Americans

meaningful access to the fruits of this society.[9]

Of particular note is this Court's decision in City of Richmond v. J.A. Croson Co., ___ U.S. ___, 109 S.Ct. 706 (1989). In Croson, addressing the "tension between the Fourteenth Amendment's guarantee of

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[9]See, e.g., Patterson v. McLean Credit Union, 57 U.S.L.W. 4705, 4711 (U.S. June 15, 1989) (Brennan, J., dissenting) ("What the Court declines to snatch away with one hand, it takes with the other."); Wards Cove Packing Co., Inc., v. Atonio, 57 U.S.L.W. 4583, 4593 (U.S. June 5, 1989) (Blackmun, J., dissenting) ("One wonders whether the majority still believes that race discrimination -- or, more accurately, race discrimination against nonwhites -- is a problem in our society, or even remembers that it ever was."); City of Richmond v. J.A. Croson Co., ___ U.S. ___, 109 S.Ct. 706, ___ (1989) (Marshall, J. dissenting) ("[T]oday's decision marks a deliberate and giant step backward in this Court's affirmative action jurisprudence."). In recent years, Native Americans have similarly suffered major setbacks to time-honored rights central to their being. See, e.g., Lyng v. Northwest Indian Cemetery Protective Ass'n, ___ U.S. ___, 108 S.Ct. 1319 (1988).

equal treatment to all citizens, and the use of race-based measures to ameliorate the effects of past discrimination on the opportunities enjoyed by members of minority groups in our society," this Court invalidated the City of Richmond's minority business set-aside, holding that there was no direct evidence of race discrimination by the city to justify its efforts to remedy the present effects of past discrimination. There the dissenters appropriately lauded the "welcome symbol of racial progress when the former capital of the Confederacy acts forthrightly to confront the effects of racial discrimination in its midst." Conversely, where, as here, the former capital of the Confederacy acts forthrightly to resurrect and revitalize racial discrimination by employing the power of the state judiciary

to impose badges and indicia of slavery upon its Black citizens, it is incumbent upon this Court to accept jurisdiction of this action and to declare the right of Black Virginians to enforce in federal court their fundamental freedom -- equal to white Virginians -- "to teach, preach, write, or speak any [pure expression of] opinion [not amounting to 'fighting words'], however ill-founded, without inhibition by actions for libel and slander."[10]

II.

With the passage of the Thirteenth Amendment, Congress announced not only the guarantee of physical liberty for those of African descent, but also the eradication of the "stamp of inferiority" which had theretofore characterized their

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[10] Chaves, 335 S.E.2d at 101-2.

existence.[11] Intrinsic to this newly recognized right was the freedom of individual expression and autonomy. The right thus recognized was independent of any other right previously guaranteed under the Constitution.

Answering the question, "What was the 'slavery' which the Thirteenth Amendment would abolish?" Jacobus tenBroek enumerated the three-fold meaning of the word slavery as used and understood by the Congress that legislated to terminate its existence. [12] First, tenBroek noted, "[s]lavery in its

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[11] See Kinoy, The Constitutional Right of Negro Freedom Revisited: Some First Thoughts on Jones v. Alfred H. Mayer Company, 22 Rutgers L.Rev. 537 (1968); Jones v. Alfred Mayer Co., 392 U.S. 409, 440 (1968).

[12] tenBroek, Thirteenth Amendment to the Constitution of the United States: Consummation to Abolition and Key to the Fourteenth Amendment, 39 Calif.L.Rev. 171, 179 (1951).

narrowest and strictest sense -- slavery as legally enforceable person servitude --- would . . . be forever 'put down and extinguished'" by the Thirteenth Amendment.[13] Second, recognizing that the "free colored person . . . bore all the burdens, badges and indicia of slavery save only the technical one," tenBroek maintained that the amendment conferred upon all Negroes basic fundamental rights, with the guarantee that those rights would "receive 'the protection of the government,' the protection of 'equal laws.'"[14] The amendment would extend and safeguard, among other basic rights, "the right to be educated to the 'race imbruted by long years of enforced ignorance.'"[15]

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[13] Id.

[14] Id.

[15] Id. at 180.

Finally, recognizing the incidents of slavery visited upon white abolitionists, the Thirteenth Amendment "would protect citizens in their rights under the First Amendment and comity clause to freedom of speech, freedom of press, freedom of religion and freedom of assembly."[16]

Section 1983[17] provides:

> Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress.

The scope and purpose of § 1983 as born out by historical analysis of its genesis

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[16] Id.

[17] 42 U.S.C. § 1983.

indicate that Congress intended by its promulgation to protect those rights guaranteed by the Thirteenth Amendment and enforced by the Fourteenth Amendment. Noting that § 1983 derived from § 1 of the Ku Klux Klan Act of 1871, this Court in District of Columbia v. Carter, 404 U.S. 418 (1973), observed that "in the final analysis, § 1 of the 1871 Act [and consequently, § 1983] may be viewed as an effort 'to afford a federal right in federal courts because, by reason of prejudice, passion, neglect, intolerance or otherwise, state laws might not be enforced and the claims of citizens to the enjoyment of rights, privileges, and immunities guaranteed by the Fourteenth [and Thirteenth] Amendment[s] might be denied by

the state agencies.'" [18]

Fleming's § 1983 action is the classic case of non-enforcement "by reason of prejudice, passion, neglect, intolerance or otherwise" by the state judiciary of the equal rights guaranteed him under the Thirteenth Amendment. As such, Fleming is entitled to seek relief pursuant to the original jurisdiction of the federal

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[18] 404 U.S. at 428-29 (quoting Monroe v. Pape, 365 U.S. 167, 180 (1961)). Carter considered the contrast between the reach of the Thirteenth and Fourteenth Amendments. See id. at 423. Recognizing that whereas the Thirteenth Amendment constitutes "an 'absolute' bar to all . . . discrimination, private as well as public, federal as well as state," id. at 422, the Court noted that "the commands of the Fourteenth Amendment are addressed only to the State or to those acting under color of its authority." Id. at 423. Nothing in Carter, however, limits the applicability of § 1983 to rights solely recognized under the Fourteenth Amendment. Rather, by its own terms, § 1983 extends its protections to "any rights, privileges, or immunities secured by the Constitution and laws" of the United States applicable to the states.

courts. Nothing in the decisions of this Court in Rooker v. Fidelity Trust Co., 263 U.S. 413 (1923), or District of Columbia Court of Appeals v. Feldman, 460 U.S. 462 (1983), speaks to the contrary.

III.

The central question that this Court must decide, upon which all others hinge,[19] is whether Fleming's Thirteenth Amendment claim satisfies the criteria enunciated in Baker v. Carr, 369 U.S. 186 (1962). Framing the mandate of Baker v. Carr in the negative, this Court in Powell v. McCormick, 395 U.S. 486 (1969), observed that a federal district court

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[19]For example, the question whether Petitioner is precluded from raising his Thirteenth Amendment claim is secondary to the question whether the district court has jurisdiction to consider the same. Amici respectfully submit that Petitioner has adequately demonstrated that his claim was not waived and thus, is not precluded. See Petition for Certiorari at 41-44.

> lacks jurisdiction over the subject matter (1) if the cause does not "arise under" the Federal Constitution, laws, or treaties (or fall within one of the other enumerated categories of Art. III); or (2) if it is not a "case or controversy" within the meaning of that phrase in Art. III; or (3) if the cause is not one described by any jurisdictional statute.[20]

In affirming the dismissal of Fleming's lawsuit for lack of subject matter jurisdiction, the Fourth Circuit Court of Appeals did not maintain that these criteria had not been met. Rather, the court held, relying upon the Rooker-Feldman doctrine, "that federal district courts and federal courts of appeals have no authority to review a final judgment of a state court that has acted in its judicial capacity."[21] The Fourth Circuit further refused to

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[20] 395 U.S. at 512-13.

[21] See P.App. at 8.

recognize an exception to Rooker-Feldman where the alleged violation implicates fundamental constitutional rights.

Amici respectfully submit that the Fourth Circuit misconstrued both the Rooker-Feldman doctrine and the nature of the right asserted by Fleming. In Rooker the claimant sought district court jurisdiction following judgment by the state courts which he alleged "was rendered in contravention of the contract clause of the Constitution . . . and the due process of law and equal protection clauses of the Fourteenth Amendment . . . in that it gave effect to a state statute alleged to be in conflict with those clauses and did not give effect to a prior decision in the same case by the Supreme Court of the State."[22] In Feldman, the claimants -- Feldman and

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[22] 263 U.S. at 414-15.

Hickey, two applicants to the District of Columbia bar -- sought relief in federal court from rulings of the highest court of the District refusing to waive an admission requirement that Feldman and Hickey maintained violated their rights under the Fifth Amendment and the federal antitrust laws. The district courts in each instance dismissed the actions for lack of subject matter jurisdiction and this Court affirmed.

This Court explained in Feldman that "[i]f the constitutional claims presented to a United States district judge are inextricably intertwined with the merits of the judgment rendered by the state court "then the district court is in essence being called upon to review the state-court decision. This the district court may not

do."[23] Last term in Pennzoil Co. v. Texaco, 481 U.S. 1 (1987), this Court had occasion to expound upon the Rooker-Feldman doctrine and the scope of the "inextricably intertwined" requirement. Therein, four of the Justices expressly rejected the argument that Pennzoil's claims[24] were barred by that doctrine, finding instead that its claim was "'separable from and collateral to'" the merits of the state court judgment.[25]

Similarly, Fleming's claims are separable from and collateral to the underlying judgment of the state court in

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[23] Feldman, 460 U.S. at 483-84, n.16.

[24] See Petition at 36.

[25] See Pennzoil, 107 S.Ct. at 1531 (Brennan, J., concurring); id. at 1529 (Scalia, J., concurring) (joined by O'Connor,J.); id. at 1534 (Blackmun, J., concurring); id. at 1536 n.3 (Stevens, J., concurring).

his case. Specifically, a district court need not determine that a state court judgment was in a technical sense "wrong" to conclude that it independently violates fundamental constitutional rights.[26] In essence, the Rooker-Feldman doctrine proscribes federal court appellate review of an erroneous state court decision. It does not, however, strip federal courts of their rightful jurisdiction to redress independent violations arising under the federal Constitution merely because the violation is incidental to a state court

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[26]While on these facts the judgment of the Virginia Supreme Court is clearly in error, this Court must be mindful of the principle cited above. An independent comparison of a given state court decision with, for instance as here, the 1860 Virginia Slave Code or subsequent disparate decisions involving identical issues independently establishes the resurrection and imposition of badges and indicia of slavery onto Mr. Fleming of which he now complains.

decision. In other words, whereas there is no constitutional right to an error free court decision, there is "an 'absolute' bar to all . . . discrimination, private as well as public, federal as well as state,"[27] enforceable in the federal courts pursuant to their original jurisdiction.

Finally, the propriety of district court jurisdiction where legitimate Thirteenth Amendment violations are alleged is reinforced by this Court's decisions interpreting the meaning and purpose of that amendment. In Patterson v. McLean Credit Union, 57 U.S.L.W. 4705 (June 15, 1989), this Court left intact the 1976

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[27] District of Columbia v. Carter, 404 U.S. 418, 422 (1973). See also Jones v. Alfred H. Mayer Co., 392 U.S. 409, 424 (1968) (Congress plainly intended "to secure . . .[the] right[s protected by § 1982] against interference from any source whatever, governmental or private").

decision of Runyon v. McCrary, 427 U.S. 160 (1976), which held that the prohibitions against racial discrimination contained in 42 U.S.C. § 1981 extended to private parties. Notwithstanding the questions raised with respect to the constitutional bases for § 1981 and, consequently, its scope, it has never been disputed that one of the primary objectives of the Thirteenth Amendment was to remove legal disabilities from African slaves and their descendants. Rejection of jurisdiction in the instant case will permit the unfettered restoration of such disabilities and significantly chill the exercise by Black Virginians of their federally protected right to "universal freedom."[28]

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[28] See Kinoy, supra note 11, at 537; see also Petition for Certiorari at 45-50.

CONCLUSION

A Writ of certiorari is necessary in this case to reaffirm the national commitment to eradicate the vestiges of slavery wherever they may arise. If the hard won legal principles of the Civil War and Civil Rights eras are eliminated as viable options to redress racial discrimination, the characterization by historian Harold Cruse[29] of the end of the

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[29]In the introductory page to Plural but Equal, Professor Cruse quotes a prescient T. Thomas Fortune, the principal founder of one of the first national civil rights organizations, the National Afro-American League:

> . . . As the agitation which culminated in the abolition of African slavery in this country covered a period of fifty years, so may we expect that before the rights conferred upon us by the war amendments are fully conceded, a full century will have passed away. We have undertaken no child's play. We have undertaken a serious work which will tax and exhaust the

1960's as a "civil rights cycle" is indeed, and unfortunately, accurate. Cruse describes a cycle as a 'course or series of events or operations that recurs regularly and usually leads back to the starting point."[30] We have come far and yet not far enough in our struggle for racial equality to once again encounter the starting point.

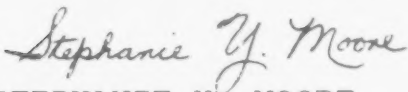
For the foregoing reasons, amici respectfully urge that a writ of certiorari be granted.

> best intelligence of the race for the next century . . . .

H. Cruse, Plural but Equal (1987).

[30] Id. at 7.

Respectfully submitted,



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Counsel express their appreciation for the assistance provided by David P. Dean and Deborah A. Powell in the preparation of this brief.

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JOYCE F. WHITE, Clerk
BY: Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

JAMES N. FLEMING,
Plaintiff,

v.

W. BEDFORD MOORE, III, et al.,
Defendants.

Civil Action No.
87-0004-C

Civ OB #19, p 148

ORDER

For the reasons stated in the accompanying Memorandum, and deeming it just and proper so to do, the Court hereby ADJUDGES and ORDERS as follows:

1. Plaintiff's motion to amend his complaint is hereby GRANTED.

2. Defendants' motions to dismiss are hereby GRANTED, and this case stands DISMISSED for lack of subject matter jurisdiction.

Let the Clerk send a copy of this Order and the accompanying Memorandum to all counsel of record.

UNITED STATES DISTRICT JUDGE

Date 07/22/87

JOINT STATEMENT OF INTEREST OF *AMICI CURIAE*

The organizations joining in this brief *amici curiae* work in a variety of ways to protect and further the civil rights of minorities in this country. They share the belief that progress toward eradicating racism depends in part on a clear mandate from the United States Supreme Court. They further believe that the Court should act to ensure effective redress for the violation of Thirteenth Amendment rights by granting *certiorari* in this case.

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Boston, MA 02108

Mobilization For Survival
853 Broadway #418
New York, NY 10003

The Nation Institute
72 Fifth Avenue
New York, NY 10011

National Conference
of Black Lawyers (NCBL)
126 West 119th Street
New York, NY 10026

National Lawyers Guild
853 Broadway
New York, NY 10003

National Rainbow Coalition
30 West Washington Blvd.
Chicago, IL 60602

New Directions for Women
108 West Palisade Avenue
Englewood, NJ 07631

Old Dominion Bar Association
Alfreda T. Harris, President
506 North Main Street
Suffolk, VA 23434

Puerto Rican Legal Defense &
Education Fund
99 Hudson Street
New York, NY 10013

Southern Arizona Chapter
National Lawyers Guild
c/o Paul Gattone
1422 East Lee
Tucson, AZ 85719

Virgina State Conference
of NAACP Branches
112 E. Clay Street
Richmond, VA 23219